



## Privacy Disclosure

<b>FACTS</b>	<b>What does NorthCountry Federal Credit Union do with your personal information?</b>
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>■ Social Security number</li> <li>■ Transaction or loss history</li> <li>■ Account balances</li> <li>■ Credit history</li> <li>■ Transaction history</li> <li>■ Assets</li> </ul>
<b>How?</b>	All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons NorthCountry Federal Credit Union chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does NorthCountry Federal Credit Union share?	Can you limit this sharing?
<b>For our everyday business purposes</b> – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> – to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	Yes	Yes
<b>For our affiliates' everyday business purposes</b> – information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>■ Call toll-free (800) 660-3258</li> <li>■ Visit: <a href="http://www.northcountry.org">www.northcountry.org</a></li> </ul> <p><b>Please note:</b> If you are a <i>new</i> member, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> a member, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
<b>Questions?</b>	Call toll-free (800) 660-3258 or go to <a href="http://www.northcountry.org">www.northcountry.org</a>

What We Do	
<b>How does NorthCountry Federal Credit Union protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does NorthCountry Federal Credit Union collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ Open an account</li> <li>■ Apply for a loan</li> <li>■ Provide employment information</li> <li>■ Provide your mortgage information</li> <li>■ Show your driver's license</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> <li>■ <b>NorthCountry Federal Credit Union has no affiliates.</b></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> <li>■ <b>NorthCountry Federal Credit Union does not share personal information with nonaffiliates.</b></li> </ul>
<b>Joint Marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <b>Our joint marketing partners include TruStage, CUNA Brokerage Services Inc, and LPL Financial LLC.</b></li> </ul>
Other Important Information	
<p><b>For Vermont Members.</b> We will not share personal information with nonaffiliates for them to market to you without your authorization and we will not share personal information with affiliates or for joint marketing about your creditworthiness without your authorization.</p>	

## Mobile App Privacy Disclosure

NorthCountry Federal Credit Union's mobile app periodically collects, transmits, and uses location data to enable push notification, geofence, and beacon campaigns to send alerts and support advertising, even when the app is closed or not in use. This enables features that prevent fraudulent card use and notifies users of any important notices, but only if the end user expressly authorizes collection of such information. Location data can be monitored on a continuous basis in the background, only while the solution is being used or not at all, depending on the end user's selection. End users can change their location permissions at any time in their device settings.